

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CASE NO. 3:00-CR-147-GCM-DSC-1**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOHAMAD YOUSSEF HAMMOUD,
aka Ali A.A. Abousaleh,
aka Ali A.A. Albousaleh,**

Defendant.

**MOTION TO REDUCE SENTENCE
PURSUANT TO 18 U.S.C. § 3582(c)(1)(A)(i)
(ORAL ARGUMENT REQUESTED)**

PLEASE TAKE NOTICE that, for the reasons set out in the accompanying Memorandum of Law, Defendant Mohamad Youssef Hammoud, by and through undersigned counsel, hereby moves this Court to issue an order reducing his sentence to time served pursuant to the amended 18 U.S.C. § 3582(c)(1)(A)(i). Mr. Hammoud has demonstrated “extraordinary and compelling reasons” due to the drastic disparity between Mr. Hammoud’s sentence versus the sentence he would have received if sentenced today. While Mr. Hammoud faces a 30-year sentence, the average defendant convicted for similar crimes today would only be sentenced to a total of 4.8 years—six times less than Mr. Hammoud’s sentence. Considering Mr. Hammoud’s disproportionate sentence, conviction for a non-violent crime, and substantial rehabilitation while in prison, extraordinary and compelling reasons warrant reducing Mr. Hammoud’s sentence.

Mr. Hammoud requests oral argument on this motion on a date and time to be designated by the Court. If granted oral argument, counsel requests thirty minutes of argument for each side.

Dated: February 11, 2022

Respectfully submitted,

/s/ James P. McLoughlin, Jr.
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HAMMOUD

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2022, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of filing to counsel of record listed as receiving e-mail service. It is further certified that, on this day, the foregoing was sent via regular U.S. mail, postage prepaid, and addressed to the following counsel of record not receiving electronic notifications via CM/ECF:

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Dated: February 11, 2022

/s/ James P. McLoughlin, Jr.